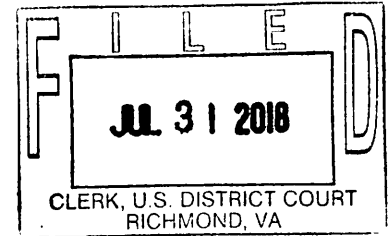


IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
Richmond Division



HENRICO COUNTY SCHOOL BOARD

Plaintiff,

v.

Civil Action No.: 3.18-cv-00110-REP

GREGORY MATTHEWS and TONIE
MATTHEWS as parents and next friends
of G.M.,

Defendants.

STATEMENT FROM KANDISE N. LUCAS PER JUDGE PAYNE'S ORDER

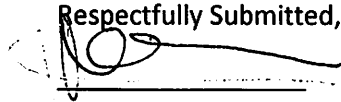
Per the July 27, 2018 order of the Honorable Judge Robert Payne, Kandise N. Lucas is submitting the following statement:

1. The Motion To Quash was prepared Pro Se as asserted by Kandise N. Lucas.
2. In my role as Lay Advocate, I have been responsible for researching and drafting countless documents in relation to special education administrative due process hearing, under the IDEA. I routinely research the Federal Rules of Civil Procedure within this role.
3. Dr. Zoe Spencer, who is a researcher, provided the Federal Rules of Civil Procedure to include in my Motion To Quash. She referred me to Federal Rules of Civil Procedure 26 and 45, which I researched and utilized in the preparation of my Motion To Quash.

4. I also relied upon the case law provided to me by Attorney Selene Almazan, the Legal Director of Parent Attorneys and Advocates, Inc., COPAA, which is *D.F. v. Collingwood Borough Bd. Of Educ.*, 694 D. 3d 488 (3rd Cir 2012)
5. I conducted additional research based the IDEA regulations, OSEP guidance documents, and relevant case law.
6. The Motion To Quash was drafted with the assistance of Dr. Zoe Spencer, who provided edits for vocabulary enhancement, grammar, typos, and grammatical flow. She provided no legal advice.

I humbly appreciate the opportunity to clarify this matter with the Court in an effort to ensure that Ms. Lucas' integrity in this matter is preserved.

Respectfully Submitted,

A handwritten signature in black ink, appearing to read 'Kandise Lucas', is written over a horizontal line.

Kandise Lucas, Pro Se